

MEMORANDUM ENDORSED

The Law Offices of



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Via ECF

Hon. Gregory H. Woods
United States District Court Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 12/12/2023

Re: United States v. David Glover 22 Cr. 522 (GHW)

Dear Judge Woods:

I represent David Glover in the above referenced indictment. Mr. Glover's current bail conditions are home detention with GPS monitoring. Based on a recommendation from Mr. Glover's Pretrial officer Jonathan Lettieri, and without objection from the government, I write to ask that Mr. Glover's bail conditions be modified to a curfew set by Pretrial with GPS monitoring.

On November 16, 2023, the Court granted the defense's request to allow Mr. Glover to move from his girlfriend's home to an address approved by Pretrial.¹ I have since learned from Mr. Lettieri that Mr. Glover lives with a brother. However, since his brother works full-time, Mr. Glover no longer has the support he previously had from his girlfriend's family to help him buy groceries and other basic items. In addition, Mr. Lettieri informs me that Mr. Glover is often offered extra work shifts at the last minute, which Mr. Lettieri is unable to approve due to the timing of said offers. Lastly, now that Mr. Glover no longer lives with his daughter, a curfew would make it easier for Mr. Lettieri to approve Mr. Glover's visits with his daughter.

This bail modification would allow Mr. Glover's Pre-trial officer the discretion to approve requests such as those discussed above.

DATED: NEW YORK, NEW YORK
December 11, 2023

Application granted. The conditions of Mr. Glover's pretrial release are modified as follows: the condition requiring home detention with GPS is deleted and replaced with a curfew set by Pretrial with GPS monitoring. All other conditions of the defendant's pretrial release remain in full force and effect. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 267.

SO ORDERED.

Dated: December 12, 2023
New York, New York


GREGORY H. WOODS

United States District Judge

Respectfully Submitted,


Christine Delince, Esq.

¹ I apologize for not signing my letter dated November 15, 2023. It was an oversight on my part. I thank the Court for granting the application without my signature.